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February 2, 2018

VIA ECF

The Honorable Sidney Stein
United States District Judge
Southern District of New York
500 Pear Street
New York, NY 10007

Re: Candie Hailey Means v. City of New York, et al., 17 CV 5374 (SHS) (KNF)

Your Honor:

I am a member of The Cochran Firm, attorneys for Candie Hailey Means in the above-referenced matter. I write to correct the record related to Defendants' Reply Memorandum of Law in Further Support of Defendants' Motion to Dismiss In Part Plaintiff's Amended Complaint, filed today by ECF Dkt. #29. Specifically, Defendants claim in their Reply that Plaintiff asserted facts and exhibits in her Opposition to Defendants' motion (ECF Dkt. #28) that are not incorporated in the Amended Complaint itself. (Defendants' Reply Memo at 1). While Defendants fail to specify what facts they are referencing, the only exhibit attached to Plaintiff's Opposition is Exhibit 1, the Department of Corrections ("DOC") January 6, 2014 press release announcing that it was permanently closing its longstanding punitive segregation unit for inmates with mental illness. That press release was indeed incorporated and referenced in Plaintiff's Amended Complaint. See Amended Complaint, Dkt. #14 at ¶53 which asserts facts related to punitive solitary confinement and contains an embedded link to the press release. I have attached the press release hereto for your reference.

Thank you for your consideration.

Sincerely,

Tracey L. Brown
The Cochran Firm
Attorneys for Plaintiff

Cc: Michael Gertz, Esq. (via ECF)